April 13, 2021

Russell Fish
Office of Remediation 3LC20
U.S. Environmental Protection Agency
1650 Arch Street
Philadelphia, PA 19103-2029

RE: Response to EPA Comments
Phase 3 RCRA Facility Investigation (RFI) Report
Former Delaware Valley Works Facility – South Plant, North Parcel
Claymont, Delaware

Dear Mr. Fish:

On behalf of Honeywell International Inc. (Honeywell), Wood Environment & Infrastructure, Solutions Inc. (Wood) is submitting this response to the U.S. Environmental Protection Agency (EPA) comments on the groundwater attachment to the December 4, 2020 "Phase 3 RCRA Facility Investigation (RFI) Report, Former Delaware Valley Works Facility – South Plant, North Parcel". For your convenience, we have repeated your comment below, followed by Honeywell's response.

***EPA Comment***. *With respect to the evaluation of groundwater data documented in the Phase 3 RFI Report, EPA accepts the data collected from the four existing monitoring wells on the North Parcel but views the data set to be incomplete. As referenced in EPA's email dated August 20, 2020, EPA has determined that Honeywell must provide additional data to determine the extent of groundwater contamination and for EPA to determine if existing waste material is contributing to a release to groundwater. A listing of locations where supplemental groundwater data is required can be found in Attachment 1 to this letter.*

**Honeywell Response**. Honeywell has reviewed EPA's list of additional well locations along with the historical soil and groundwater data collected at the South Plant, North Parcel (the Site).

Honeywell agrees with the following EPA-proposed well locations shown on Figure 1.

- Installation of a new monitoring well MW-125 at Area of Concern (AOC) 11, Former Contact Sulfuric Acid Plant Area A – Aboveground Storage Tank (AST) Area Sumps and Building Sump (EPA's "Location AOC11-HP01"), based on concentrations of pesticides in exceedance of EPA Regional Screening Levels (RSLs) for pesticides and the EPA Maximum Contaminant Level (MCL) for gamma-BHC.
- Installation of a new monitoring well MW-126 at EPA's "Location C" as an upgradient monitoring well from monitoring well MW-101 based on concentrations of volatile organic compounds (VOCs), including vinyl chloride, in exceedance of MCLs, and RSLs.
- Installation of nested monitoring wells (one shallow replacement monitoring well MW-106R and one deep monitoring well MW-106D) at the location of former well

MW-106 based on concentrations of chlorinated VOCs, particularly tetrachloroethene (PCE), in exceedance of MCLs and RSLs.

- Installation of nested monitoring wells (one shallow replacement monitoring well MW-114R and one deep monitoring well MW-114D) at the location of former monitoring well MW-114 based on concentrations of benzene and metals in exceedance of MCLs and RSLs.
- Installation of replacement monitoring well MW-115R based on concentrations of arsenic in exceedance of the MCL and RSL.
- Installation of one deep monitoring well MW-101D at existing monitoring well location MW-101 based on concentrations of chlorinated VOCs in exceedance of MCLs and RSLs.

Honeywell is not in agreement with EPA on the need to install the other EPA-proposed monitoring wells. Honeywell bases its disagreement on three general concerns. First, for EPA monitoring well Locations A and B, downgradient existing or former monitoring wells show that there are no significant sources of contaminants in the proposed locations, as confirmed by the lack of AOCs and Solid Waste Management Units (SWMUs). Second, for EPA monitoring well Locations A, B, and D, existing or proposed wells already provide downgradient coverage of contaminants that might be present. And finally, for the EPA deep wells MW-103, MW-105, MW-107, MW-112, MW-115, and AOC11-HP01, deep wells are unnecessary because the relevant exceedances are minor and the contaminants are expected to decline in concentration with depth, not increase. In more detail, Honeywell's concerns are as follow:

- Location A. Existing monitoring well MW-105 and former monitoring wells SAL-1 and SAL-3 are located downgradient of monitoring well MW-112 based on historical groundwater contour maps (see Figure 2) and have similar constituents and concentrations, indicating that no additional unknown sources exist between monitoring wells MW-112 and MW-105. No additional SWMUs or AOCs have been identified between monitoring wells MW-112 and MW-105. Monitoring well MW-105 adequately serves as a downgradient data point for monitoring well MW-112.
- Location B. Based on historical (2003) and recent (2020) groundwater data, there are no exceedances of MCLs in monitoring well MW-103 and the only RSL exceedances are chloroform, alpha-BHC, beta-BHC, and 4,4'-DDD. Proposed monitoring well MW-125 would function as a downgradient data point for monitoring well MW-103 based on historical groundwater contour maps (see Figure 2). The slight to moderate exceedances of RSLs in monitoring well MW-103 do not warrant an additional downgradient groundwater monitoring well. In addition, no SWMUs or AOCs have been identified upgradient of Location B.
- Location D. Based on historical groundwater contour maps (see Figure 2), Location D would not be located downgradient of monitoring well MW-101. Rather, Honeywell proposes that replacement monitoring well MW-106R would serve as a downgradient data point for monitoring well MW-101.
- Deep Monitoring Wells MW-103, MW-105, MW-107, MW-112, MW-115, and AOC11-HP01. There are generally only minor exceedances of the RSLs and MCLs in these monitoring wells and the only exceedances of the MCLs are metals, benzene,

methylene chloride, total xylenes, naphthalene, bis-(2-ethylhexyl)phalate, and vinyl chloride in monitoring well MW-112; metals and pentachlorophenol in monitoring well MW-105; metals in monitoring well MW-107; metals and benzene in monitoring well MW-115, and metals and gamma-BHC in hydropunch well AOC11-HP01. Specifically, regarding chlorinated VOCs, which would be of most interest because of the potential for concentrations of chlorinated VOCs to increase with depth, the only exceedance of the RSLs or MCLs was vinyl chloride in monitoring well MW-112 in 2003 (10 micrograms per liter [ug/L] compared to the RSL of 0.02 ug/L and the MCL of 2 ug/L). The 2020 results indicated a vinyl chloride concentration of 2 ug/L for monitoring well MW-112 with no exceedances of MCLs for chlorinated VOCs in monitoring wells MW-103, MW-105, and MW-112. These relatively low concentrations do not warrant deep monitoring wells at the locations of monitoring wells MW-103, MW-105, and MW-112. However, Honeywell has proposed deep monitoring wells MW-101D, MW-106D, and MW-114D as discussed above.

As requested by EPA, all existing and newly installed monitoring wells will be sampled and analyzed for VOCs, semi-volatile organic compounds (SVOCs), Target Analyte List (TAL) metals, and pesticides.

Honeywell will submit a work plan, within 30 days after EPA approval of Honeywell's proposed monitoring wells. Please contact Prashant Gupta if you have any questions or require additional information.

Sincerely,

Wood Environment & Infrastructure Solutions, Inc.

John P. Mihalich, P.G.
Associate Geologist

Kevin J. McKeever, P.E., P.G.
Branch Manager/Principal Engineer

Attachment: Figures 1 and 2

cc: Larry Matson – DNREC
Jennifer A. Wilson, P.G. – PADEP
Prashant Gupta – Honeywell
Nelson Johnson – Arnold & Porter


LEGEND

- BOUNDARY BETWEEN COMMONWEALTH OF PENNSYLVANIA AND STATE OF DELAWARE
- APPROXIMATE SOUTH PLANT, NORTH PARCEL BOUNDARY
- EXISTING MONITORING WELL LOCATION
- MONITORING WELL NOT LOCATED DURING JULY 16, 2020 INSPECTION
- **MW-115R** — PROPOSED MONITORING WELL
- **LOCATION B** — EPA PROPOSED MONITORING WELL
- **MW-126/LOCATION C** — PROPOSED MONITORING WELL/EPA PROPOSED MONITORING WELL

PROJECTION / DATUM: DE83F

0 100' 200'

SCALE: 1" = 200'

Honeywell

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PREPARED BY: PJC

CHECKED BY: JPM

REVIEWED BY: JPM

**FIGURE 1**
**RESPONSE TO EPA COMMENTS**

**GROUNDWATER SAMPLING DATA REPORT**
FORMER DELAWARE VALLEY WORKS - SOUTH PLANT, NORTH PARCEL
CLAYMONT, DELAWARE

PROJECT NO.: 7772190018

REVISION NO.: 0

DATE: APRIL 2021

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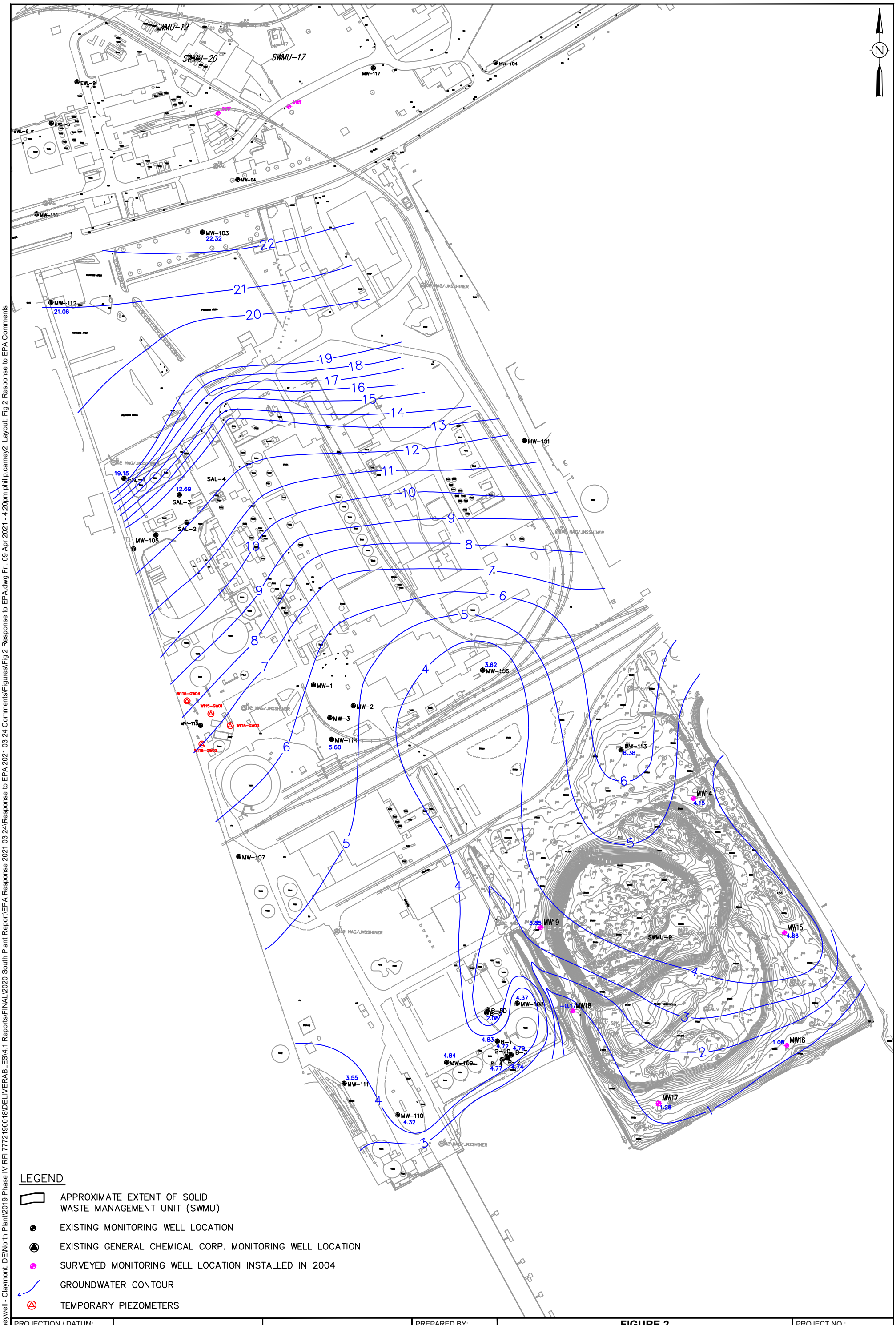


## LEGEND

- APPROXIMATE EXTENT OF SOLID WASTE MANAGEMENT UNIT (SWMU)
- EXISTING MONITORING WELL LOCATION
- EXISTING GENERAL CHEMICAL CORP. MONITORING WELL LOCATION
- SURVEYED MONITORING WELL LOCATION INSTALLED IN 2004
- GROUNDWATER CONTOUR
- TEMPORARY PIEZOMETERS

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|---|---|---|---|---|---|
| PROJECTION / DATUM: DE83F<br>0 125' 250'<br>SCALE: 1" = 250' | Honeywell<br>DELAWARE VALLEY WORKS<br>CLAYMONT, DELAWARE | wood.<br>751 Arbor Way, Suite 180<br>Blue Bell, PA 19422<br>Tel. 610-828-8100<br>www.woodplc.com | PREPARED BY: PJC<br>CHECKED BY: JPM<br>REVIEWED BY: JPM | **FIGURE 2**<br>**RESPONSE TO EPA COMMENTS**<br>**GROUNDWATER SAMPLING DATA REPORT**<br>FORMER DELAWARE VALLEY WORKS - SOUTH PLANT, NORTH PARCEL<br>CLAYMONT, DELAWARE | PROJECT NO.: 7772190018<br>REVISION NO.: 0<br>DATE: APRIL 2021 |